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10 ANTHONY THOMAS and WENDI
11 THOMAS and AT EMERALD, LLC

ELECTRONICALLY FILED
June 23, 2014

9 UNITED STATES BANKRUPTCY COURT
10 DISTRICT OF NEVADA

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12 In Re:
13 ANTHONY THOMAS and
14 WENDI THOMAS,

Case No. BK-N-14-50333-BTB
Case No. BK-N-14-50331-BTB
Chapter 11 Cases

[Jointly Administered]

15 AT EMERALD, LLC,

16
17 Debtors.
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**EX PARTE MOTION FOR ORDER
SHORTENING TIME FOR NOTICE
AND HEARING ON MOTION TO
SELL ASSETS FREE AND CLEAR OF
LIENS AND MOTION TO FILE
PURCHASE AND SALE AGREEMENT
UNDER SEAL**

19 Hearing Date: OST Pending
20 Hearing Time: OST Pending

21 _____ /
22 Debtor, AT EMERALD, LLC, a Nevada limited liability company, by and through
23 its counsel, Alan R. Smith, Esq., of the Law Offices of Alan R. Smith, hereby moves this
24 Court for an order shortening time for notice and hearing on the Debtor's Motion To Sell
25 Assets Free And Clear Of Liens And Motion To File Purchase And Sale Agreement Under
26 Seal (the "Motion") filed on June 23, 2014.

26 Pursuant to the Motion the Debtor seeks an order authorizing the sale of Debtor's
27 asset, a 21,000 carat emerald. The Purchase And Sale Agreement requires the Debtor to seek
28 approval of the sale on shortened time. Furthermore, although the Debtor believes that the

1 subject emerald is well protected, it is not insured. The U.S. Trustee has brought a motion
2 to convert the case for that reason. *See* Docket No. 27. In light of these facts, the simplicity
3 of the motion, and the fact that the sales price is sufficient to pay all creditors of both cases
4 in full, Debtor requests the Motion be heard within seven days of its filing date as required
5 by the Purchase And Sale Agreement.

6 Local Rule 9006 provides that the Court may shorten time in appropriate
7 circumstances for good cause. Based upon the foregoing, Debtor believes that good cause
8 exists for shortening time for notice and hearing of the Debtor's Motion. The Debtor's
9 attorney (or his designated employee) has contacted the principal parties affected by the
10 subject Motion and their agreement and comments are in the ATTORNEY INFORMATION
11 SHEET filed separately.

12 WHEREFORE, Debtor respectfully requests that the Court shorten the time for notice
13 of hearing on the Motion, and that the hearing on said Motion be set within seven days of the
14 filing of the Motion or as soon as possible and as is convenient to the Court's calendar.

15 Dated this 23rd day of June, 2014.

16 LAW OFFICES OF ALAN R. SMITH

17 By: /s/ Alan R. Smith
18 ALAN R. SMITH, ESQ.
19 Attorney for Debtors
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